

1 THE VELAN LAW FIRM
2 A Professional Corporation
3 Victor Lipovetsky (SBN. 170962)
4 3701 Geary Boulevard, Suite 101
5 San Francisco, California 94118
6 Telephone: (415) 379-9300
7 Facsimile: (415) 379-9343

5 Attorneys for Plaintiff(s)
ANNA DUBROVA and DAVID SHAFRANSKIY,
6 individually and as Successors In Interest to
MIKHAIL SHAFRANSKIY, deceased.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 ANNA DUBROVA and DAVID
12 SAFRANSKIY, Individually and as Successors
In Interest to MIKHAIL SAFRANSKIY,
deceased,

CASE NO. CV07 5755 JL

Magistrate Judge: James Larson

**SECOND EX-PARTE APPLICATION FOR
EXTENSION OF TIME TO SERVE AND
CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE AND
ADR DEADLINES**

Initial Case Management Date: May 21, 2008-
@10:30am (Courtroom F, 15th floor, SF)

Complaint Filed: November 13, 2007

VICTOR LIPOVETSKY appearing *Pro Hac Vice* in this action; in support of this application hereby certifies on oath that:

22 1) I am an attorney licensed to practice law in the State of California.
23 2) I am the attorney of record for Plaintiffs ANNA DUBROVA and DAVID
24 SHAFRANSKIY, Individually and as Successors In Interest to MIKHAIL SHAFRANSKIY,
25 deceased, in this matter.

26 1) Service of Summons and Complaint with attendant papers has not been effectuated
27 on the Defendants, SAN FRANCISCO MARITIME (NATIONAL HISTORIC PARK),
28 NATIONAL PARK SERVICE, U.S. DEPARTMENT OF THE INTERIOR, which was

1 originally due on January 11, 2008, but an extension of time was obtained through April 10,
2 2008, but no additional extensions have been obtained.

3 2) Plaintiff requests a further 90-day continuance of time to serve the complaint and
4 accompanying documents as plaintiffs are trying to negotiate a settlement with the defendants
5 for the amount of the medical bills only.

7 5) In addition, in order to allow more time to settle the case prior to further litigation,
8 plaintiffs request the Court reschedule the Initial Case Management Conference currently
9 rescheduled for **May 21, 2008, for 90 days and reschedule all ADR deadlines.**

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct and that this declaration was executed on April 3, 2008, at San
12 Francisco, California

VICTOR LIPOVETSKY, Attorney for Plaintiffs,
ANNA DUBROVA and DAVID SHAFRANSKIY
Individually and as Successors in Interest to
MIKHAIL SHAFRANSKIY, Decedent